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Employment

Development Plan Document

(Employment DPD)

Scope, Issues and Options



North Warwickshire
Borough Council

January 2024

1 Introduction

What is Development Plan Document?

- 1.1 A development plan document is a planning policy document which in part will replace or supplement the policies in the adopted North Warwickshire Local Plan 2021.
- 1.2 The purpose of this paper is to set out the scope of the paper and the issues that may need to be addressed through an Employment Development Plan Document (DPD). Where possible options for the way forward are discussed. The paper identifies a range of issues which are briefly set out with questions shown in yellow boxes. These are not exhaustive and other options may be brought forward as part of the consultation process.

2 Background

National Guidance

- 2.1 The National Planning Policy Framework (NPPF) provides the overarching national planning policies. Any local planning policies must be in accordance with the NPPF and follow the planning policy guidance unless there is evidence to indicate that locally a different course of action should be taken. This is a high bar to pass and so the evidence must be relevant, robust and up to date.
- 2.2 The NPPF sees that planning has three overarching objectives of economic, social and environment. The economic objective states:
“a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.”
Chapter 6 of the NPPF then seeks to build a strong, competitive economy.

Emerging National Policy / Guidance

- 2.3 It is recognised that there will be changes to the NPPF following the enactment of the Levelling Up and Regeneration Bill (LURB), expected during 2023. To use the current system of producing planning policy documents this document must be submitted to the Secretary of State by June 2025 through the current suggested transitional arrangements. Therefore, this paper will start preparation using the current system and, if required, move to the new system as more guidance emerges.

North Warwickshire Local Plan (Adopted 2021)

- 2.4 The Development Plan for an area, which includes the adopted North Warwickshire Local Plan, should be read as a whole. There are broad policies from the Local Plan which impact on development generally so are relevant when looking at the issues

around employment such as policies LP1 Sustainable Development, LP2 Settlement Hierarchy, LP3 Green Belt, LP4 Strategic Gap and LP5 Amount of Development. There are also specific employment related policies in Chapter 9 of LP11 Economic Regeneration, LP12 Employment Areas and LP13 Rural Employment. These policies are attached as Appendix A.¹

- 2.5 The full Local Plan can be found on our website at: www.northwarks.gov.uk, search for Local Plan (Adopted 2021) in the search facility on the Council's homepage. It is anticipated that this DPD will review and amend if required the following policies: Chapter 9, Employment policies including LP11 Economic Regeneration, LP12 Employment Areas, LP13 Rural Employment, Chapter 14 Allocations policy LP39 Employment Allocations. It may involve Chapter 11 Services & Facilities policies, LP21 Services and Facilities and elements of Chapter 13 Development Considerations policies in LP34 Parking, LP35 Renewable Energy and Energy Efficiency, LP36 Information and Communication Technologies,

Emerging Economic Development Strategy

- 2.6 The Borough Council prepared a draft Economic Development Strategy in 2020. This was during the pandemic, so a refresh has been undertaken with the advice provided through the LGA Economic Growth Advisers Programme. This document is part of the evidence base for the production of this paper and can be found at: www.northwarks.gov.uk. search for "*Economic Development Strategy*" in the search facility on the Council's homepage.

2.7 *Objectives and priorities*

The Economic Strategy is underpinned by four Priority Themes:

- Supporting business growth and innovation
- Securing a pipeline of talent
- Enabling investment in infrastructure to support a low-carbon, modern and forward-looking economy
- Supporting vibrant town and service centres through quality place-making.

These 4 themes are translated into an Action Plan that sets out a high-level programme for the Borough Council's economic development activities. The four priority themes are noted in the Action plan are as follows;

- Priority Theme 1: Supporting Business Growth & Innovation
- Priority Theme 2: Talent, Employment & Skills
- Priority Theme 3: Development & Connectivity
- Priority 4: Market Towns & Villages

- 2.8 In terms of most relevance for the Employment DPD, the Strategy notes the Borough Council's role and governance also involves being "A place shaper to promote a positive

¹ Please note there will be policies which may not be specifically referred to in this paper which may impact the decision on a planning application.

planning approach” and the Action Plan programmes within Priority Theme 3: Development & Connectivity, and Priority 4: Market Towns & Villages may have the most direct planning links and relationship with the emerging Employment DPD. Comments are also being sought on the Economic Development Strategy. (It is included in this consultation and specific comments can be made on that document using the separate response form on the Planning Consultation webpage), as we are migrating to a new website please search for “*Economic Development Strategy*” in the search facility on the Council’s homepage at: www.northwarks.gov.uk.

Question 1:

1a Is there anything from the Economic Development Strategy which needs to be reflected in the Employment DPD? Yes / No / Don’t know?

1b If yes, please indicate what you consider needs to be reflected in the Employment DPD?

3 Scope of the DPD

- 3.1 The original intention for the DPD when first put into the Local Development Scheme, was to focus on the issue of Strategic Employment Land (policy LP6 from the NWLP). However, should the DPD look at all employment related policies from the Local Plan? Attached as Appendix A are the employment related policies from the adopted Local Plan. One reason for doing this would be to pick up new or updated issues, not covered by policies from the adopted Local Plan.
- 3.2 In light of the Government’s policies and proposals for decarbonising all sectors of the UK economy to meet the net zero strategy target by 2050 (Build back Greener - October 2021), this DPD will also consider areas where it could contribute towards addressing that target, raising issues and seeking options to help address and reduce carbon emissions. This will be a theme/hook through much of the DPD.

Question 2:

2a Are there other policies from the adopted Local Plan that the Employment DPD should seek to review and/or amend? Such as LP5 Amount of Development or transport policies such as LP23 Transport Assessments or renewable energy and ‘Information and Communication Technologies’ policy (in so far as the impact/affect employment proposals), as well as the employment related policies in Chapter 9 of the Local Plan? Yes / No / Don’t know? If yes, Please indicate which policies?

Question 3:

*Should this DPD be limited to strategic employment land?
If not, what are the other issues the DPD should consider?*

4 Plan period for the Employment DPD

- 4.1 The NWLP has a plan period from 2019 to 2033 with the expectation that this DPD will be a standalone policy document. The Local Plan looks forward to 2033 and continues the theme of sustainable development in the right place with the right infrastructure. The Local Plan also gives an indication of where and how development will take place beyond this time frame in order to ensure a continuous supply of land. It explains how much and what type of development there will be and where this will be located. The Borough Council recognises that the pressure for growth will extend beyond 2033 and that this needs to be considered at an early stage.
- 4.2 The timescale covered by a Local Plan is referred to as the plan period. National planning policy requires that we look ahead a minimum of 15 years from the date the Local Plan is finalised. It is expected a DPD will take a minimum of 24 months or more to reach Adoption so if finalised by the end of 2025 would require a minimum time period of 2040. This however leaves little room for manoeuvre or flexibility and is likely to be impacted by future planning system changes, so a longer time-period is likely to be more appropriate. A 20-year horizon may be more appropriate to accommodate growth, or application of the time period covered by the Housing and Economic Development Needs Assessment data (HEDNA), up to 2041 or 2050. It should also be noted that many major infrastructure providers for energy, water and transport are looking at future development growth and needs programmes for infrastructure up to 2050 or further.

Question 4:

What should the plan period be for the DPD? (See options below)

Options:

- 4.1 15 years from adoption of the DPD (assuming adoption during 2025 this would be 2040)
- 4.2 A 20-year period to accommodate growth (this would likely be around 2045)
- 4.3 2041 (to mirror data from HEDNA)
- 4.4 2050 (to mirror data from HEDNA)

5 Settlement Hierarchy

- 5.1 The adopted Local Plan has a clear settlement hierarchy as outlined in NWLP Policy LP2. If the Employment DPD were to allocate land one of the issues to be considered is whether sites should fit within the existing settlement hierarchy. This would be the simplest route as it would mean that LP2 would not need to be updated. It is currently unclear if there would be sufficient opportunities to provide the sites required to fit with the current settlement hierarchy so a call for sites is being made alongside this consultation.
- 5.2 Part of the process for the adopted Local Plan was to review the Green Belt. Some small sites as well as 20 hectares of additional employment land at Hams Hall, were released from the Green Belt. If the current settlement hierarchy cannot deliver the required employment sites should sites within the Green Belt be considered?

Question 5:

Can employment land continue to fit in with the current development strategy of the adopted Local Plan? Yes / No / Don't know? If not, what other options should be considered?

Question 6:

*Should sites in the Green Belt sites be allocated for employment use?
If so, will this require a wider review of the Local Plan?*

6 Current Situation

6.1 The first issue to consider is should Local Plan Policy LP5 be altered or updated in terms of the amount of employment land. The policy requires a minimum of 100 hectares of employment land to be delivered by 2033. The table below shows the total employment land supply between 1.4.2019 and 31.3.2023 which shows that 149.19 hectares have or are being delivered. The detailed site information is supplied in Appendix C of the AMR 2022/23.

Table 1: Total Land Supply as at 31st March 2023

	over 0.4 hectares	under 0.4 hectares	Total
<i>Total Completions Since 2019/20 – 2022/23</i>			
<i>2019/20</i>	0	0.39	0.39
<i>2020/21</i>	24.25	0.47	24.72
<i>2021/22</i>	42.79	0.25	43.04
<i>2022/23</i>	0	0.25	0.25
<i>Allocations In Local Plan</i>	57.2	0	57.2
<i>Outstanding Sites with Planning Permissions as at 2022/23</i>	23.14	0.70	23.84
Total	147.38	2.06	149.44
<i>Loss of employment land</i>	0	0-0.25	-0.25
Total minus losses	147.38	1.81	149.19

(Source: Table 7 & Appendix C from the AMR 2022/23)

6.2 The HEDNA indicates that the employment land requirement for North Warwickshire is as follows:

Table 2: Employment Land Needs for North Warwickshire (hectares)

Hectares	Office	General Industrial (Class E(g)(iii) and B2)	Sub-Total	Strategic B8 (a proportion of)
2021 - 2041	5.3	56.1	61.4	551*
2021 - 2050	7.0	81.4	88.4	735*

*(Source: Extract from Table 2.1 and Table 2.2 of the Coventry and Warwickshire HEDNA Executive Summary November 2022 * Corrected version 29-03-23)*

- 6.3 The HEDNA identified needs based on past trends, including a “Labour Demand Model” (where, as forecasts are trend-based, a concentration of forecast jobs growth in warehousing in North Warwickshire is a reflection of historical development patterns although industrial labour demands appear negative), VOA trends (Valuation Office Agency demand data on trends in industrial/commercial stock, indicating North Warwickshire supports over 20% of the Study Area’s industrial market) and Completion Trends (past development trends using completions monitoring). In respect of industrial and warehousing, the HEDNA concludes that neither the VOA or labour demand models are able to differentiate the strategic and more local industrial / warehouse requirements. Both data sets both datasets have caveats and limitations. As a result, the HEDNA suggests that completions data is likely to be the best representation of market needs for the next phase of plan making for industrial / warehousing floorspace particularly for the short/medium-term. The HEDNA also note that *“Some of this need could however potentially be met through recycling of land – particularly where there are plots of over 10 ha in good quality locations which relate well to the strategic road network, have adequate power capacity and are accessible by public transport.”*
- 6.4 In respect of strategic warehousing floorspace (units of over 9,000 sq.m), the HEDNA concludes that it would be appropriate to plan for future development to be in line with recent completions trends over the initial 10-year period (2021-31), with the subsequent decade then seeing potentially slower growth in line with the traffic growth and replacement demand modelling. Nevertheless, the HEDNA notes that the spatial distribution of industrial need has been influenced in part by land availability, highlighting that *“Over the last 20 years, the amount of industrial floorspace grew by 12% across Coventry and Warwickshire. This was particularly driven by a 111% growth in North Warwickshire (influenced by development at Birch Coppice in particular, but also Hams Hall, a legacy from the Regional Spatial Strategy) but large growth of 22% also took place in Rugby.”* Furthermore, The HEDNA notes that *“whilst B8 demand is very strong, there is a need for separate allocations for B1c/B2 where land is delineated from sites going for B8 to support the manufacturing sector. There is a strong manufacturing sector in the sub-region which needs to be provided for.”*
- 6.5 As the supply of strategically large brownfield, former mining/minerals or power generation sites that generated the last 20 years of growth, such as Birch Coppice or Hams Hall, are consumed, questions must be raised over whether the levels of completions within North Warwickshire can realistically (or sustainably) be expected to be maintained? This is re-enforced by the HEDNA which again highlights that *“It would not be appropriate in our view to simply replicate past development patterns in respect of the spatial distribution of development by local authority” (Para 2.17 HEDNA Exec Summary)*. Continuing past completion trends would raise real issues for North Warwickshire in light of lack of available brownfield sites and the natural and Green Belt constraints affecting/applying to much of this rural Borough. Pressure will therefore bear primarily upon greenfield sites, sites within Green Belt, Strategic Gap and/or upon those with other transport related constraints.
- 6.6 The VOA trends for net floorspace changes are high in North Warwickshire, driven by warehousing developments and demand. These are more pronounced in recent years

influenced by strong demand for both manufacturing and warehousing/ logistics space across the country. Recent research² for South-east Midlands LEP indicated potential need for up to double the existing warehousing space over the next 20 years, even after taking into account for recycling of some existing stock. The research also noted areas such as the Midlands, that host major motorway routes, are likely to see ongoing significant demand for spaces.

- 6.7 The labour demand model produces a much narrower range and suggests that forecast industrial losses are outweighed by gains in warehousing needs in all areas although these may be overly influenced by national trends in manufacturing rather than being by actual floorspace requirements for industry.

Question 7:

7a Should the HEDNA be the basis of an employment land requirement for the Employment DPD? Yes / No / Don't know?

7b If so, should past trends be the sole determinant for future employment? Or what other information should the DPD take account of?

7 Additional Employment Land

- 7.1 Since the 2015 Strategic Employment Sites Study prepared by PBA and JLL a further study was commissioned in 2021. This was commissioned by Staffordshire County Council and the Black Country, Coventry and Warwickshire and Greater Birmingham and Solihull LEP's and was prepared by Avison Young / Arcadis. The second study was seen by those who commissioned the work as the Phase 2 work envisaged in the initial study. However, there were many shortcomings with the work and a further study has recently been commissioned by 25 organisations across the West Midlands, including North Warwickshire BC. This is known as the West Midlands Strategic Employment Sites Study (WMSESS). The required study outputs include looking at the current supply situation; assessment of need; addressing modern industry's requirements; confirming the overall quantum and type of sites required; criteria for identifying sites; identify priority areas for additional provision; stakeholder engagement; and provide additional policy advice.
- 7.2 The 2015 study determined an Area A and Area B for sites that could deliver the need originally envisaged as shown in Figure 4.11 from the 2015 Report and listed in Table 4.7, both are reproduced in Appendix C. For North Warwickshire there were 3 sites: Birch Coppice, St Modwens to south-east of Junction 10 M42 and Hams Hall. All 3 sites have been delivered.
- 7.3 As part of the Local Plan examination no amount of additional employment land, beyond that being allocated, for large users could be determine or ascertained. Therefore, the Inspector identified a need to have a policy which allowed strategic employment sites to

² Warehousing and Logistics in the South East Midlands September 2022 ICENI <https://www.semlep.com/warehousing-and-logistics/>

come forward in the absence of any indication of the amount of land that should be allocated. NWLP Policy LP6 (Appendix A) talks about significant weight being given to proposals supporting economic growth and productivity where evidence demonstrates an immediate need.

Question 8

- 8a. *What does “immediate” need mean in LP6?*
- 8b. *How can it be demonstrated?*
- 8c. *Should there be a time limit for its expected delivery if it has been identified as an immediate need? Yes / No / Don’t know?*
- 8d. *What happens (or should happen) to the site if this need does not materialise?*

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Question 9

Should the site threshold be the same as the West Midlands Strategic Employment Sites Study i.e. over 25 hectares? Yes / No / Don't know?

If not, what should the site threshold be for a 'strategic site' considered as a site falling under the currently adopted Local Plan Policy LP6?

8 Type of Employment Land

- 8.1 Historically employment within the Borough was focussed on mining, quarrying and energy utilities. In more recent year's employment sites, either existing or new sites, have focussed on logistics and warehousing with limited large-scale automotive manufacturing. In order to refocus the employment land balance the MIRA southern employment site E4 was allocated for manufacturing (Use Class B2) with research and development (Use Class Eg(ii)) in the current adopted Local Plan.
- 8.2 The manufacturing sector has historically been seen as generating a higher employment density than general warehousing. The assumption being that by concentrating on and relying on logistics uses means a lower employment density than manufacturing type uses. The 2014 Homes and Communities Agency (HCA) Employment Density Guide supported this view. However, the lack of current detailed up-to-date density data and information means this assumption is difficult to confirm. Furthermore, the move towards a more flexible approach to changes of use makes it increasingly difficult to control subsequent changes to development by planning policy, once permitted. Controls over actual employee densities are therefore likely to be unenforceable. Nevertheless, it is important to consider if and what policies should be included that may help to broaden the types of uses and their sizes to potentially encourage uses with higher employment densities.
- 8.3 The lack of manufacturing following the demise of the mining and energy industry and the recent significant increases in provision of large-scale logistics sites has reduced the range and types of employment uses within the Borough. Due to the future risks from automation and robotics there is a need to broaden the range and types of employment uses. (See footnote Localis report). The Localis Report (2018) suggests that the Borough will be the 2nd most affected Borough in the country from reducing the number of people employment on such sites due to the introduction of automation. Some however would argue that the quality of jobs increases although the overall number of posts may fall.

Question 10

10a Should land be allocated for specific employment types? Yes / No / Don't know? Please explain.

10b Should employment allocations be subdivided by type and/or use (including percentage of uses per site)? Yes / No. Please explain and provide any information on a potential split.

9 Other Employment Land

9.1 In addition to the standard employment type uses and sites, the Borough is also significantly impacted by HS2 and its current construction, involving major areas of employment uses and generating significant employment requirements. In addition to HS2 (which will have an impact over the life of the Plan) there are a number of other significant employment generating proposals/sites that are coming forward either as a result of national and/or regional needs or involve NPPF Para 149 exception compliance development within the Green Belt, for major outdoor recreational and landmark structure visitor facilities all of which are likely to generate reasonably significant levels of employment. These include the following:

Table 3: Planning Applications of Other Employment Land

<i>Reference number</i>	<i>Description and Site Location</i>
PAP/2019/0496	Proposed Wave Park Coleshill Manor Campus South Drive, Coleshill
PAP/2019/0701	The erection and operation of a landmark structure, with associated visitor centre and public open space (D2) Land Adjacent to Coleshill Manor Off South Drive, Coleshill

9.2 As part of looking at employment generally it is important to understand if the DPD should look at other employment generating uses and if a specific policy or land allocations are required. What are these uses and how much land, if any, is specifically required for their needs.

Question 11

- 11a. *What other uses should the Borough Council plan for?*
- 11b. *What size of site(s) are required?*
- 11c. *Should a criteria-based policy be developed? Yes / No / Don't know?*
- 11d. *If so, what criteria should this include?*

10 Lorry Parking

National situation

- 10.1 The National planning policy framework (NPPF 2021) sets out that local planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance.
- 10.2 In addition, the government's policy indicates that development proposals for new or expanded goods distribution centres should make provision for sufficient lorry parking to cater for their anticipated use. In preparing local plans and deciding planning applications, the specific locational requirements of different industrial sectors should be recognised and addressed.

10.3 The DoT has also indicated they are updating the 2017 National Lorry Parking Survey to ensure strong evidence is available on the national picture in future. Nevertheless, as part of the A5 Partnership, the Borough Council is aware of this issue along the A5, from layby parking and associated litter/health impacts and the limited facilities available along that major through route, as well as elsewhere in the Borough.

Local situation

10.4 A 2011 lorry parking study noted that within the West Midlands, overall lorry parking sites were well used, operating at 71%, some around Solihull operating at 100% utilisation and North Warwickshire between 71 and 100%. Nationally this was the second busiest on-site utilisation for a region.

10.5 Although Tamworth and North Warwickshire Boroughs were indicated as having some lorry parking capacity, it is noted that many adjoining local authorities' urban areas had limited or **no** capacity including Nuneaton and Bedworth, Coventry and Lichfield District. Whereas Rugby provided the largest number of spaces locally. (Some recent improvements to availability of facilities in Nuneaton and other areas have been noted in online survey TruckFly app by Michelin – 2023, but charges remain an issue).

10.6 Capacity at nearby motorway service stations (MSA's) at the M6 Corley Services, has recently been increased by an additional 83 HGV spaces following appeal in 2018 and a new MSA at Junction 1, M6 (Rugby) is now completed. Some future improvements in supply and parking capacity are also expected once the approved 'Catherine-de-Barnes option' service station on the M42, accessed via a new junction 5a, granted outline planning permission at Inquiry on 11 March 2022, is implemented. Work on the new junction is currently underway. However, much of this increase in capacity is likely to be serving through motorway traffic and not serving local needs and impacts.

10.7 In terms of HGV Parking requirements at MSA's DfT Update to Circular 02/2013 provides a calculation of 0.5% of HGV's Traffic flow (Vehicles per day), or 1% of HGV's in areas where there is an identified need to be met. This requirement drove the recent applications for parking expansion at Corley MSA.

10.8 In terms of overall current available HGV parking spaces in MSA's within a reasonable distance of North Warwickshire, the following are approximately available:

- Corley MSA (M6 J3) – 147 HGV spaces (includes 4 available spaces in the long load bay and the recent 83 granted at Appeal)
- Rugby MSA (M6 J1) – 60 spaces
- Tamworth MSA (M42 J10) – approx. 65 spaces (plus additional spaces approved in late 2020 to create capacity for up to 94 spaces),

10.9 The National Survey of Lorry Parking 2017 audited HGV parking capacity and availability and HGV parking space availability in the West Midlands was indicated as having critical utilisation of over 85%, Specifically for nearby MSA's, Corley was at 119% and Tamworth at 92% (note Rugby had not been completed and audited at that time). Over 100% levels were indicated by the number of lorries counted parked outside of the

designated parking spots, on kerbs and on car parking areas, when there were no available spaces.

Location of, and facilities on, sites for lorry parking.

- 10.10 Another issue relating to the lorry parking relates to availability of associated services and facilities, not just the parking. Welfare facilities and services are an integral provision for main lorry parking sites in many cases and for new sites a minimum of managed toilet and cleaning facilities and/or kitchen facilities, should be considered/made available for ancillary parking provision (whether on-site or integral with the existing business on site that drivers have access to these facilities). This would help alleviate pressure on public parking provision, such as laybys along main routes and address hygiene and littering issues for routes and areas where such services and facilities are limited or non-existent.
- 10.11 This may be considered for specific operators/businesses above an identified threshold (size/area/no's of parking spaces and type of commercial operation on site?) or could be applied as an across the board requirement for all proposals involving and needing an element of on-site and delivery/overnight parking. This approach may also help address affordability of provision, with on-site facilities (even if limited in nature) removing the need for drivers to seek facilities and services off-site following deliveries, particularly where time related chronograph issues reduce the ability and distance drivers can travel to main lorry parking sites/facilities,
- 10.12 Potential sites may be identified as part of the "Call for Sites" process, and/or along with or as part of an employment site? (This will be included in the forthcoming call for Sites exercise).
- 10.13 To address this particular issue there are a number of possible questions and options that can be considered.

Question 12

Should all employment sites include an element of lorry parking? Yes / No?

Question 13

If yes, should the DPD only require lorry parking sites or areas within future employment sites over a certain size threshold. Please indicate what that employment site size threshold should be, 10, 20, 25 ha's or strategic sites of 50 or more only? Please explain your reasons for the threshold chosen.

Question 14

*Should there be standalone lorry parking provision (not necessarily directly related to employment sites/estates or operators/businesses?) Yes / No?
If so, where and what facilities should they provide?*

11 Farm Diversification

11.1 Part of Policy LP13 dealing with Rural Employment in the North Warwickshire Local Plan deals with farm diversification. It states:

LP13 Rural Employment

Farm Diversification

Proposals for farm diversification through the introduction of new uses onto established farm holdings will be supported where it can be demonstrated that:

- a) the development in terms of its scale, nature, location and layout would contribute towards sustaining the long-term operation and viability of the farm holding;
- b) it would not cause an unacceptable adverse impact to the safe and free movement of pedestrian, vehicular or other traffic on the trunk or rural road network as a result of heavy vehicle usage,
- c) there would be no adverse impacts arising from increased noise or other form of pollution,
- d) there are adequate foul drainage facilities, and
- e) there would be no adverse impact on the character of the surrounding natural or historic environment.

11.2 There is limited recent planning application evidence available indicating that increased farm diversification proposals for employment generating uses have been forthcoming. The changes over recent years to both permitted development rights and National Planning Policy and Guidance has, however, encouraged and enabled farms, to redevelop through prior notifications of agricultural buildings/complexes for up to 5 dwellings, or their individual conversion and change of use where they are traditional in style and design. Further relaxation and flexibility is proposed in 2023 to extend permitted development rights that may intensify and increase this trend.

11.3 There may therefore be a major change to and impact on the character of farms and businesses in the countryside, with greater focus on, and opportunities for redevelopment for housing. Should this approach be resisted and if so how? In light of proposed changes to GPDO rights and relaxing prior notification requirements the level of control (through impact assessment and detailed consideration of planning applications) will significantly reduce and future control to prevent the loss or redevelopment of a new rural employment site may need to be through either application of an Article IV designation on such sites, effectively removing the sites Permitted Development Rights.

11.4 Current existing employment estates are identified within the Local Plan policy LP12 Employment Areas, to which constraints on redevelopment and changes of use outside of employment uses is applied (within and between classes E, B2 general industrial and B8 warehouse and distribution Use Classes only). Is this an approach that could or

should be considered for rural areas and large farm complexes and rural businesses, that would need to be identified, to maintain and protect rural employment opportunities? This may increase as an issue in light of proposed relaxation of and changes to General Permitted Development Orders (GPDO) legislation, national policy and guidance.

Question 15

Should this Employment DPD have policies relating to farm diversification and loss of agricultural buildings, modern or traditional? If so, what should the policy cover?

Question 16

Should this Employment DPD have policies for the retention and prevention of loss through redevelopment of major rural businesses and farm/agricultural complexes, similar to policy LP12 on existing employment areas/estates? Yes / No / Don't know?

- 11.5 As part of farm diversification opportunities and the pressure to reduce Carbon emissions through renewable energy proposals there has been an increase in applications for large sites being brought forward for energy generation or battery storage, in particular, solar farms within and around the Borough. This is particularly evident in the SE sector of the Borough, as this area can link to the national grid within the next 15 years, via a direct underground cable connection as part of the proposals recently granted planning consent.
- 11.6 Although the need to address climate change is important, there are concerns over potential impacts such large-scale loss of productive agricultural land uses may have in terms of food supply and production. There are circumstances where appropriate solar panel design enables some continued agricultural uses beneath the solar panels, but this would not apply to battery storage proposals. There are nevertheless concerns over the loss of “best and most versatile land” to such alternative sustainable energy uses and this may be an issue the Employment DPD needs to consider for a rural Borough such as North Warwickshire. The term 'best and most versatile land' refers to: 'Land defined as grade 1, 2 or 3a of the Agricultural Land Classification. This land is considered the most flexible, productive and efficient and is most capable of delivering crops for food and non-food uses.

Question 17

Should this Employment DPD have policies relating to solar farms, battery storage and wind turbines? If so, what criteria should they include? e.g. relating to design, location, visual impact and/or land quality.

Question 18

Should this DPD have specific policies relating to, or seeking avoidance of loss of Grade 1 or 2 agricultural land and directing such sustainable energy uses/sites towards Grade 3 or less? Yes / No or Don't know. Please explain your answer.

12 Affordable Employment Land / Buildings

- 12.1 The Local Plan is clear that it is essential to maintain a balance between housing and employment provision. This can often be challenging because residential values in the Borough exceed most forms of employment use and, (anecdotally), there is often pressure from developers to release employment land for housing use.
- 12.2 In addition, the relaxation of permitted development rights and the focus on brownfield pdl (previously developed land) opportunities for redevelopment has also reduced availability of employment land supply and increased land values (through increased competition for higher value uses) thereby impacting on affordability of land, particularly for small to medium businesses and startup firms. This applies in both urban and rural situations within the Borough.
- 12.3 Similarly, the difficulties in providing rural affordable housing availability highlighted in the 2019 Parliamentary Report, '*Time for a strategy for the rural economy*', are also noted for rural businesses and employment, where "a related challenge is the availability and affordability of rural working spaces, particularly for smaller businesses."
- 12.4 The Coventry & Warwickshire Sub Regional Employment Market Signals Study, in July 2019 noted that 'High take-up levels (of employment/commercial space) have led to increases in rents across the Coventry and Warwickshire sub-region'. The Study notes that the Chambers of Commerce in Coventry and Warwickshire and the FSB have suggested that more generally there is a shortage of suitable premises for smaller and new-start businesses, particularly in respect of small workshops. There is also a real issue of "affordability", with a shortage of available premises across the size spectrum, at low rents.
- 12.5 To try and address this issue new employment land allocations and provision should consider including space for small to medium business units, or small startup and "incubator" units to provide opportunities for new businesses and commercial enterprises to establish, grow and contribute to broadening the employment supply and character across the Borough, but particularly within rural areas. This not only has the benefit of providing a more 'sustainable' choice and opportunity for employment but may also help reduce commuting and travel to work distances for the rural population and contribute toward reducing carbon emissions.
- 12.6 Once provided, the concern will also remain around the continued availability and "churn" of small sites, to provide future opportunities for startup businesses. Currently the Adopted Local plan provides an element of protection from redevelopment to the Boroughs identified industrial/employment/business estates such as Birch Coppice, Carlyon Industrial Estate or Holly Lane/Innage Park estate, notwithstanding the current national proposals to relax the General Permitted Development Rights (GPDO) for changes of use and redevelopment of pdl land and employment uses/buildings.
- 12.7 Question 15 of this Draft Employment DPD Scope, Issues and Options document comments on this issue. But the consideration of wider application to small rural employment sites within the Borough may also be an option. If the changes to GPDO rights (including removing the 3 month minimum vacancy requirement for premises immediately prior to the date of the application for prior approval) means this level of

control over start-up sites or incubator unit development future availability is prevented (lost) the only real secure opportunity for future control and constraint to the loss or redevelopment of a new rural employment site would be through either application of an Article IV designation to such sites, effectively removing the sites Permitted Development Rights, or through compulsory purchase of the site by the Borough Council, to ensure greater control over redevelopment, rental levels and availability.

- 12.8 The use of planning controls, through application of planning conditions to planning consents on a site, is an alternative approach. However, this would have limited weight and power in light of both the relaxations being made to permitted development rights subsequently applying to the site or buildings and to the ability of future planning applications to be submitted for changes to/alteration and removal of planning conditions, which again, would be expected to reflect and respond to changes in permitted development rights resulting in the loss of the site/facility and use.

Question 19

Should new (major or strategic?) employment site allocation policies/proposals include an area/element specifically for small to medium units? Yes / No

Question 20

- 20a. *Should the Borough seek to provide and identify sites for start-up incubator units available at an affordable rent level (similar to the approach for affordable housing provision)? Yes / No?*
- 20b. *If so, should such provision be across the Borough or focussed on rural areas and settlements or other approach? Please provide an explanation.*
- 20c. *Should sites specifically for small start-up incubator units be supported by policies for their retention and prevention of loss through redevelopment? Yes / No / Don't know??*
- 20d. *Would you support this approach if it required either application of Article IV designations (involving removal of specific permitted development rights) or pressure to Compulsory Purchase sites to ensure control over future development and any GPDO 'Permitted Development' rights changes? Yes / No / Don't know? Please explain your answer.*

13 Climate Change and Net Zero

- 13.1 The Borough Council declared a Climate Change emergency in October 2020 and has prepared an Action Plan which outlines some of the actions the Borough Council will take. The Local Plan has some policies which seek to ensure that buildings are built well and can generate renewable energy. Increasingly Building Regulations require buildings to be built to certain standards. Planning policy should therefore not duplicate what is already being requested through that route. However, information on climate change and progress to net zero is moving at a pace. Is the Local Plan therefore the best place to encourage further implementation towards net zero?

- 13.2 Many of the “big sheds” are only built with a relatively short live span of between 20 to 30 years. Although this means that there is flexibility as the needs of the occupier changes it also means that to replace buildings it can have a major impact on resources.
- 13.3 The supply of employment/warehousing land can also be partly addressed through the re-use and redevelopment, or “churn” of existing sites. Encouraging this approach will help contribute towards supply of sites while minimising the physical land take and reducing visual impacts from new greenfield development. The need to be flexible and accommodating the wholesale redevelopment of sites for new users and uses, however, also needs to be balanced against the consumption of, and impact on resources and Climate Change. Where change of use with minimal demolition and redevelopment of a site and buildings can be achieved, reducing materials and energy consumption, this should be encouraged/enabled,
- 13.4 The need to ensure the recycling of any waste generated by redevelopment, including construction, demolition and excavation waste such as brick, stone, concrete and asphalt, should also be encouraged and enable them to be re-processed to provide products for the construction industry to re-use. The Waste Local Plan (the Warwickshire Waste Core Strategy 2013), encourages such approaches and uses, by supporting Secondary and Recycled Aggregate production to a standard whereby it can be re-used in new construction projects, so it ensures that less primary aggregate is required, maximising reuse and recycling of the County’s waste and reducing the amount that is disposed to landfill. However, the Waste Local Plan is out of date in relation to Climate Change in any significant detail, in respect of national policies and requirements, so this issue is being raised as to whether North Warwickshire cover and include this issue in this DPD to help address climate change? This approach could also be applied to existing site redevelopment proposals, through a criteria-based policy including a series of steps and questions as follows:
- Avoid demolition, if possible (why can’t the building be re-used?),
 - Mitigate if not possible through re-use of materials,
 - If can’t re-use then show how materials will/could be recycled (where possible),
 - Design of new should have a longer life design built in.

Applying this approach may address a gap in policy where requiring a sequential approach to re-use and recycling will help address Climate Change targets (in addition to the reduction in waste and efficient use of resources aims). However, it will need to be considered whether the responsibility and application of such a policy lies within the remit of this DPD or a County function as part of a revised Waste Plan?

Question 21

- 21a. *Should we use the policies from the adopted Local Plan, LP35 Renewable Energy and Energy Efficiency, to try and progress to net zero? Yes / No / Don’t know?*
- 21b. *Does the policy go far enough? Yes / No / Don’t know?*
- 21c. *Or are building regulations the better way to secure net zero buildings / sites? Yes / No / Don’t know?*

Question 22

- 22a. *Should there be specific policies referring to net zero buildings included within the DPD or should this be dealt with through Supplementary Planning Documents? Specific policies / Supplementary Planning Documents?*
- 22b. *What should these policies and/or SPD's include?*

DRAFT

Question 23

23a *Should there be greater flexibility and encouragement for changes of use and redevelopment of existing sites, to help address demands? Yes / No / Don't know?*

23b *If so, How would this be applied?*

Question 24

24a. *Should there be simple policy support and encouragement for re-use of demolition and waste material ? Yes / No / Don't know?*

24b *or should there be a policy 'requirement' for programmes/schedules indicating re-use of demolition and waste materials from redevelopment sites/proposals, applying a "sequential test" criteria approach to site redevelopment? Yes / No / Don't know?*

24c. *Is this policy approach within the remit of an Employment DPD? Yes / No / Don't know?*

14 Design of Employment Sites

- 14.1 The physical and visual impact of new large scale industrial and warehousing buildings can be significant in both landscape terms in a rural borough and in residential amenity terms through oppressive, overshadowing and overlooking of adjoining uses and residential areas. The Borough Council is therefore considering producing supplementary planning design guidance either as part of the Draft Design Code work for the Borough or as a stand-alone draft Design Code or Supplementary Planning Document (SPD) specifically for major employment and logistics buildings/estates, large strategic sites and for sites in open rural areas and/or close to residential areas.
- 14.2 Prior to this issue being addressed through a Draft Borough Design Code or SPD, should this Employment DPD consider addressing the issue through a criteria-based design policy, covering setting, colour, signage, height and floor levels for instance? As discussed in sections 10 and 12 and Question 21 above, the issues of climate changes and carbon reduction could also be addressed through policy or as part of a draft Design Code or SPD, seeking a move towards zero carbon designs.

Lighting

- 14.3 The lighting of sites, especially ones which are built in previously unlit areas, need to be carefully considered. Light pollution and glow into the sky is an issue, as well as on-site security, and needs to be addressed as part of developments. It is proposed to update the Lighting SPD which was adopted by the Borough Council in 2003 and work is currently underway. Current Local Plan Policy LP29 'Development Considerations' and LP30 "Built Form" include reference to lighting design and reduce sky glow, glare and light trespass. Nevertheless, lighting could also be included as part of a design criteria-based policy, specifically relating to the impact from employment developments. Informal guidance from CPRE in 2016 notes the need for authorities to develop policies

to control light pollution in local plans for rural locations and that areas that benefit from existing “dark skies” and tranquil areas are protected.³

- 14.4 The issue of “Tranquillity” as addressed in Natural England/CPRE publications is a major one for some locations in the Borough being targeted by Logistics pressure or transport infrastructure and major sub-regional visitor proposals (such as “The Prayer Wall” and “Surf Centre”) with cumulative impacts along the Coleshill Corridor and M42 Corridor. The main motorway junctions may already be impacted by noise but the added built form in scale and size and lighting from new development will have an even greater impact on Tranquillity and rural character that should be addressed.

Question 25

25a. *Should building design be addressed in the short term through a criteria-based policy in the employment DPD or left to a Design Code or SPD for the Borough? criteria-based policy / a Design Code or SPD / Don't know?*

25b. *If a criteria-based policy, should the policy also address Climate change and Zero Carbon design issues as well? Yes / No / Don't know?*

Question 26

Is it sufficient to rely on the adopted policies in the Local Plan 2021, as they refer to lighting, and updating the Lighting Supplementary Planning Document (SPD) sufficient to control lighting on employment sites? Yes / No / Don't know?

15 Other Local Plan policies

- 15.1 The current Local Plan includes Policy LP12 protection for identified existing current employment estates. New employment sites/uses in the rural areas also have some protection from redevelopment by policy LP11 Economic Regeneration. With growth over time some of these estates have increased in area and also some large employment sites within the Borough, not covered by LP12 areas but potentially covered by LP11, have also grown. Should these growth areas (including smaller rural estates covered by LP11) benefit from an LP12 type Policy protection, being specifically designated and shown on a proposals map? This may help address some emerging concerns over increased flexibility in allowing redevelopment for non-employment uses, proposed in forthcoming changes to General Permitted Development Orders (GPDO) legislation, national policy and guidance. As these changes involve relaxation and broadening of GPDO permitted development rules there would likely be the necessity to consider applying Article IV restrictions locally, removing those specific GPDO rights.⁴

³ Source: CPRE 2016 Night Blight: Mapping England’s light pollution and dark skies

● should develop policies to control light pollution in local plans which will ensure that existing dark skies are protected, and that new developments do not increase local light pollution. CPRE maps can be used as evidence to inform decisions on local planning applications.

⁴ See - Article 3(4) of the GPDO 2015 provides that permitted development (PD) rights will not apply if they are ‘contrary to any condition imposed by any planning permission granted or deemed to be granted under Part 3 of the [TCPA 1990] otherwise than by this Order.

Question 27

In light of recent changes to GPDO permitting changes of use to employment and commercial development (Class B1, B2, B8 and Class E) without requiring planning consent (or subject only to 'Prior Notices) is there benefit in applying employment designations to areas/estates that have no or limited control, and subsequently applying Article IV designations to those designated areas.? Yes / No / Don't know?

Question 28

- 28a Should we apply employment change of use restriction designations for smaller rural employment estates in light of the GPDO changes? Yes / No / Don't know?*
- 28b If yes, what size of sites and what distances/location from settlements should be considered appropriate before application of such restrictions?*
- 28c Please explain your reasons.*

16 Call for sites

- 15.1 A call for sites will be carried out alongside the consultation on this paper. It is proposed the call for sites is for all developments and not just those being promoted for employment use. This is to ensure that sites which may be thought suitable for one particular use are considered for other uses. This will ensure we will be aware of all potential sites and so can be assessed at the earliest opportunity.
- 16.2 The Coventry and Warwickshire Housing and Economic Land Availability Assessment (HELAA) Methodology (February 2022) will be used by the Borough Council to assist with the initial sifting of sites. The methodology has been agreed across the Coventry and Warwickshire area and is available to view on the Borough Council's website at: www.northwarks.gov.uk. Search for "HELAA" in the search facility on the Council's homepage.

Question 29

Are there any local issues that should be considered in addition to those outlined in the HELAA methodology at this initial stage?

17 Sustainability Appraisal

- 17.1 A sustainability appraisal (SA) is required to accompany the development of planning policies. Although the current system is being changed a SA Scoping Report using current guidance has been prepared and is being consulted at the same time as the consultation on this document. The Levelling Up and Regeneration Bill launched a new form of environmental assessment known as Environmental Outcome Reports (EOR). The intention is that Environmental Outcome Reports will replace the existing system of Sustainability Appraisals (SA), Strategic Environmental Assessments (SEA) and Environmental Impact Assessments (EIA). Further guidance is awaited. In the meantime, the Borough Council has refreshed the scope of the SA/SEA and is the

subject of a separate consultation. Please search for “*Planning Consultations*” in the search facility on the Council’s homepage at: www.northwarks.gov.uk.

18 Evidence base

- 18.1 A planning policy document must be based on evidence that is proportionate to the subject being considered. Alongside consultation on this Employment DPD the Borough Council will be carrying out a ‘Call for Sites’ and producing an Economic Development Strategy as part of that evidence. To date the evidence to be used in the production of this DPD will include the following documents and forms of information:

Table 4: Evidence

HEDNA (Housing and Economic Development Needs Assessment for the Coventry and Warwickshire area).	November 2022
Strategic Employment Sites Report – currently being delivered	Due Autumn/Winter 2023
A Call for Sites	Winter 2023
North Warwickshire Economic Development Strategy – refreshed document	Spring 2023

Question 30:

What other evidence is required to move forward with an Employment DPD?

And finally

Question 31:

Are there any other comments that you would wish the Borough Council to take account of when preparing planning policies in relation to employment?

**Policies relating to
Employment from the adopted North Warwickshire Local Plan 2021**

LP1

Chapter 6 Sustainable Development

- 6.1 When considering development proposals that accord with policies in the Local Plan, the National Planning Policy Framework is also a material consideration. As delivery of the Local Plan is very important to the Council it will take a positive approach that reflects the presumption in favour of sustainable development. The Borough Council will always work proactively with applicants and other stakeholders jointly to seek solutions which mean that proposals can be approved wherever possible, and to secure development which sustainably improves the economic, social and environmental conditions in North Warwickshire.
- 6.2 Place making is a key part of considering development proposals and making them sustainable whatever their size. There are two overarching elements that make development proposals work for the long term. These are ensuring the development is of a quality that is long-lasting, and that infrastructure is provided.

Quality of Development / Place

- 6.3 The quality of development is important and can be helped through early consideration of the development. This is particularly the case in considering the natural and historic environment and how this will be dealt with. Considering biodiversity at an early stage of the planning process will assist in building in beneficial features to aid biodiversity.
- 6.4 The Council will work with and look to developers to contribute effectively to maintaining and developing local Quality of Life and assisting in the delivery of the Sustainable Community Strategy, through high standards of development; the type and character of buildings and uses proposed and from measures of the type set out below:
- ensure that the impact of development on the social fabric of communities is considered and taken into account;
 - seek to reduce social inequalities;
 - address accessibility (both in terms of location and physical access) for all members of the community to jobs, health, housing (particularly affordable housing), education, shops, leisure and community facilities;
 - take into account the needs of all the community, including particular requirements relating to age, sex, ethnic background, religion, disability or income;
 - deliver safe, healthy and attractive places to live; and,
 - support the promotion of health and well-being by making provision for physical activity including walking and cycling.
- 6.5 In addition to delivering suitable forms of development in appropriate locations, a main objective of the Core Strategy was to promote high quality development at all times. This continues in this Local Plan and policies in this Plan are formulated with this objective in mind. Quality developments rely on a combination of factors including aesthetics of the buildings; how water is dealt with and how development fits within the landscape, both rural and urban. Other policies play an equal part in the achievement of quality developments such as how access is gained to

a site and how cars and lorries are treated within a scheme. All are crucial in achieving high quality developments within the Borough and making places work.

- 6.6 The Design Council has developed the Building for Life (BfL)¹ standard, in conjunction with the Home Builders Federation and is supported by government as the standard for the design quality on new homes. BfL provides a means of ensuring new housing meet appropriate design standards; respect their setting and are sustainable, thus creating quality places.
- 6.7 The Borough Council will encourage the use of the BfL standard within new residential developments. It will look to promote Building for Life and where appropriate, offer specific guidance drawing on this initiative. Consequently, the aim is to ensure that all new housing developments achieve a good standard of design as defined by the BfL standard and serve the needs of the existing and future residents.
- 6.8 Ensuring high quality design across the commercial and industrial sector is equally as important. Many elements of the BfL standard apply to non-domestic buildings and the Council will seek that development achieves a good standard.
- 6.9 The Council recognises the importance of planning development to reduce the opportunity for crime, including terrorism. Whilst crime levels across the Borough are generally lower than other areas of the West Midlands, design should ensure such figures are maintained and further lowered where possible. The fear of crime especially at night is still an issue. The Borough Council will use the Secured by Design² principles, which are widely accepted to contribute to lowering crime rates.
- 6.10 North Warwickshire is made up of a number of communities and thus there are very differing styles. With the Borough having over 50 settlements it is important that the local distinctiveness is reflected in any developments. This is particularly important in settlements that for the settlement hierarchy have a co-joined settlement boundary. This does not detract from the fact that these places consider themselves separate with each having their unique identities.
- 6.11 The Landscape Character Appraisal and individual Settlement Appraisals have been carried out and will be developed further into Supplementary Planning Documents and should be used as the basis for creating locally distinctive proposals. The Landscape Character Assessment identified landscape sensitivity areas surrounding settlements and these will be used when assessing impacts from developments. The Borough Council has Design Champions and they will be used to promote and encourage local distinctiveness in new developments.
- 6.12 Development can adversely affect public rights of ways. Therefore, the Council wants to ensure that public rights of way, where relevant to the development proposed, are protected and enhanced (including via relocation or alternative provision where justified).
- 6.13 Planning applications should be submitted with evidence to show how the design, scale and layout match the historic pattern of the surrounding development, its built form, density and overall appearance.

Implementation and Infrastructure

- 6.14 The delivery of infrastructure at the right time and in the right place will be essential to the success and delivery of developments for this Local Plan. Infrastructure can range from the provision of services and facilities to the provision of the open spaces to the provision of emergency services and waste collection services serving new homes. Considerable

importance is attached to the need to ensure that existing and future local communities in North Warwickshire have reasonable access to a range of services and facilities.

¹ Design Council 2015; Building For Life, <http://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition>

² ACPO CPI, 1989; Secured by Design, www.securedbydesign.com

- 6.15 A number of factors underpin the importance of planning agreements and Section 106 contributions in North Warwickshire:
- The area is relatively remote with a small but dispersed population and this has an impact on the cost of service provision.
 - The Borough Council has a history of working in partnership with developers to secure and deliver local benefits through the Planning process.
 - The area does not benefit from any significant UK, regional nor EU regeneration regimes.
 - There are significant public concerns to ensure the impacts of development are mitigated.
 - Again, there is public concern to maintain the provision of local services that are vital to community life.
 - Limited Council resources reflecting a small and rural population.
- 6.16 In the context of planning for the growth of an area, infrastructure can be defined as physical development needed to support communities and which directly relates to economic development and regeneration. This includes:
- Transport Networks - Pedestrian facilities, roads, public transport, cycle ways;
 - Health Facilities - Hospitals, care provision, GP and dentist surgeries
 - Education - Schools, higher education, research infrastructure;
 - Town and Local Centre improvements - Enhancements to the public realm through providing new facilities and highway improvements;
 - Green Infrastructure - Enhancing and creating networks of open spaces;
 - Leisure Facilities - Open space and built recreation facilities;
 - Protection of Environmental Assets - Mitigating impact from development on internationally and nationally protected habitats and species;
 - Utilities Facilities – Energy / waste / wastewater/ drainage plants, networks and treatment facilities;
 - Flood Prevention - Strategic defences to protect the town and enable growth;
 - Renewable Energy - District heating and renewable energy networks;
 - Communications Infrastructure - Broadband and mobile phone access;
 - Community Facilities - Includes libraries, community halls etc.
 - Emergency services
- 6.17 More details are provided in the Infrastructure Delivery Plan, Supplementary Planning Documents, and the evidence which underpins this Local Plan as indicated in Appendix C of this Local Plan. This information will be updated through the Plan period by the Council and the numerous partners, agencies and organisations.
- 6.18 Contributions towards infrastructure provision will be sought through appropriate use of planning conditions and obligations in accordance with national policy and associated Planning Practice Guidance, and statute
- 6.19 Alongside this Local Plan is an Infrastructure Delivery Plan. This sets out the known infrastructure requirements to accommodate the growth within the Borough. This will be

updated on a regular basis. The Plan will feed into a Community Infrastructure Levy (CIL) which is a new planning charge that came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010 (now amended by the Community Infrastructure Levy (Amendment) Regulations 2011). The Borough Council will work with partners to develop a Community Infrastructure Levy charging schedule as well as seek alternative funding opportunities. Both S106 obligations and CIL will need to have regard to viability issues to ensure the level of levy set or obligations sought does not prevent the delivery of development in general.

- 6.20 The policies give a framework within which assessments of S106, CIL or other legal agreements will be made. These will be supplemented, where necessary, over time by further advice in the form of guidance notes and Supplementary Planning Documents.

Future Growth

- 6.21 The Borough Council recognises that the pressure for growth will extend beyond 2033 and that this needs to be considered at an early stage. It will explore with partners and stakeholders' options for future growth of the Borough beyond 2033 to ensure options are explored and the required infrastructure is provided in a timely manner. This will enable a wide range of options to be explored, ensure infrastructure and the funding of it will be provided accordingly and that places are created that are sustainable.

LP1 Sustainable Development

Planning applications that accord with the policies in this Plan (and where relevant, with other development plan policies including those in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, applications will be determined in accordance with the presumption in favour of sustainable development.

Quality of Development / Place

All development proposals must;

- be supported by the required infrastructure
- be consistent with the approach to place making set out through development management policies, including, where relevant
- integrate appropriately with the natural and historic environment, protecting and enhancing rights of way network where appropriate
- demonstrate a high quality of sustainable design that positively improve the individual settlement's character; appearance and environmental quality of an area;
- deter crime;
- sustain, conserve and enhance the historic environment;
- provide, conserve and enhance biodiversity; and,
- create linkages between green spaces, wildlife sites and corridors.

Development should protect the existing rights of way network and where possible contribute to its expansion and management.

Implementation and Infrastructure

Infrastructure will be sought where it is necessary, directly related to the development and is fairly and reasonably related in scale and kind to the development. It may be related to social, economic and/or environmental issues. Supplementary Planning Guidance and documents will be used to guide provision, Infrastructure requirements are outlined in the Infrastructure Delivery Plan (For clarity, infrastructure projects drawn from the IDP are itemised and indicated to be either critical to the Plan's strategy as a whole, or necessary in association with particular allocations or projects, along with indicative timings are itemised in NWBC26, Appendix A) and the supporting documents contained in Appendix C of the Local Plan. The list is not exhaustive as each will be taken on a site by site basis and will depend on the viability of the scheme. Other site specific measures will be considered at the time of the planning permission. These will be secured through conditions, S106's or other agreements considered appropriate to ensure its delivery. It will be necessary to ensure the ongoing maintenance, where appropriate, of any infrastructure provision.

Where development is proposed in excess of plan requirements and would assist in the provision of or enabling infrastructure, particularly that related to facilitating development in the long term, or of affordable housing relative to needs, that will carry weight in favour of granting permission.

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LP2

Chapter 7 Spatial Strategy

- 7.1 The Local Plan sets out the long term strategic policies and proposals. It identifies a Borough-wide pattern of development and sets out the sites to bring forward the required development.
- 7.2 The Spatial Strategy is a key component of the Local Plan for delivering a sustainable way of living and working and considering the appropriate distribution for development. It seeks to allow development to take place in a controlled pattern throughout the Borough. The pattern of development has been influenced by considering how the Borough functions, as well as the impact of surrounding cities and towns. Future development will take place in accordance to the size of the settlement taken, with its range of services and facilities and is influenced by considering if the settlement is in or outside of the Green Belt. This will mean that the majority of development will take place in the larger settlements, with more limited development in the smaller rural settlements and in particular those not in the Green Belt. This will benefit those who currently live, work and visit the Borough and future generations and ensure that development is directed to the most appropriate place. A constraints map is attached as Appendix N.
- 7.3 The Local Plan's approach is still to steer most development to the Main Towns and then in a cascade approach in other settlements with very little development towards the countryside. A limited amount of development is targeted to the smaller settlements which follow the recommendations of the Matthew Taylor Report which advocated more development in the rural areas, to assist in maintaining the vitality of the rural settlements.
- 7.4 The Matthew Taylor Review on the Rural Economy and Affordable Housing showed that historically, settlements can grow incrementally, and this can help to maintain the balance between restraint and the continuing vitality of the settlements. In the Core Strategy this approach was widened to consider the holistic development of services and facilities to help maintain and enhance thriving communities. The constant aim is to provide these in the most sustainable way, without it stimulating pressure on the countryside, in particular, the Green Belt to make suitable provision for development necessary to sustain rural communities, by focussing rural housing development and supporting facilities on a network of Local Service Centres, but with limited development provision in other smaller settlements, identified with a development boundary on the Policies Map. Elsewhere, other than where specifically provided for in the Plan, development will be limited to that requisite for agriculture, forestry or other uses that can be shown to require a rural location. This Local Plan carries this forward.
- 7.5 The difficulty arises in determining how much development should be allowed in the smaller settlements, particularly as 60% of North Warwickshire is within the Green Belt. For example, it has been estimated to warrant an additional primary class that over 150 new dwellings would be required. In many locations this is not feasible when trying to balance the needs of the local community, the protection of the local environment, the character of the settlement/landscape and ensuring that the development is as sustainable as possible. To keep a village shop profitable is indeterminable, as changing shopping habits can easily skew this. In some locations a small village can sustain a village shop, whilst in other locations the shop is not profitable. In these instances, however, it is not just seeing shops as shops, but it is the need to protect those premises as a community asset with wider potential.
- 7.6 Atherstone with Mancetter and Polesworth with Dordon, are the Main Towns. Coleshill is also recognised as a Market Town due to its range of services and facilities, but development will

be smaller in scale due to the Green Belt wrapping around the settlement. There are five Local Service Centres located throughout the Borough, which provide important local services and facilities. Housing growth has generally been distributed to the Market Towns (including Coleshill) and then to Local Service Centres. In settlements, villages and hamlets beyond these, development that provides for local housing needs and help support local services will be permitted.

- 7.7 The amount of development now being envisaged means that the Borough Council has had to consider whether it is appropriate or possible that all the required development can fit into this settlement hierarchy. As the hierarchy underpins many of the policies within the Plan it is important to ensure there is flexibility to ensure development is delivered. As a result, it is considered necessary to allow developments that may be on the outer boundary of the Borough that are close to sustainable settlements outside of the Borough such as Tamworth and Nuneaton.
- 7.8 This Local Plan allocates strategic and non-strategic housing sites. Further allocations may come forward through Neighbourhood Development Plans, prepared by Parish Councils. All development proposals from housing, employment and retail will be expected to accord with the settlement hierarchy and be proportionate to the size and scale of the settlement.
- 7.9 Although in the past it was only local affordable housing that could be supported in the smaller settlements, now a small proportion of market housing as well as affordable has been allocated to some of the smaller settlements in order to assist with maintaining the vitality of these smaller communities. So, in smaller settlements small scale housing developments that help regenerate and support the rural economy or meet proven affordable housing needs (via a local housing needs assessments) can still be considered. If plan monitoring shows that this distribution is not being maintained through planning permissions, the position will need to be redressed through a revision to this policy.
- 7.10 In the Core Strategy it was suggested that in Category 4 settlements, sites would normally be no larger than 10 units at any one time. The reason behind this was to ensure small communities were not swamped by new developments but could grow organically and naturally to be sustainable. This is still the case and continues to be the stance of the Council. However, it is clear in the production of this Plan that sites that have been put forward for development are not the smaller incremental sites and tend to be larger. For this reason, there are some allocations that are larger. In these cases the Borough Council will discuss phasing options where viability permits.
- 7.11 Work is continuing at a sub-regional level with neighbouring authorities to develop a Sub-Regional Spatial Strategy. This will build on the work already carried out and will reflect issues arising from the creation of the Coventry & Warwickshire Local Enterprise Partnership (CWLEP). It is not expected that this work will alter the specific Spatial Strategy for North Warwickshire.

LP2 Settlement Hierarchy

Development within the Borough will be proportionately distributed and be of a scale that is in accordance with the Borough's settlement hierarchy. Development will be commensurate with the level, type and quality of day to day service provision currently available and the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development in liaison with service providers.

In Categories 1 to 4 settlements development within development boundaries will be supported in principle. Development directly adjacent to settlement boundaries may also be acceptable, including that which would enhance or maintain the vitality of rural communities, provided such development is proportionate in scale to the relevant settlement and otherwise compliant with the policies in the plan and national planning policy considered as a whole (including in respect of Green Belt protections)

Category 1: Market Towns of Atherstone with Mancetter and Polesworth with Dordon and the Green Belt Market Town of Coleshill

Category 2: *Settlements adjoining the outer boundary of the Borough*

Development will be permitted directly adjacent to built up areas of adjoining settlements if:

- a) the site lies outside of the Green Belt or Strategic Gap
- b) development would integrate clearly with wider development
- c) has a clear separation to an existing North Warwickshire settlement to ensure the character of North Warwickshire settlements are preserved; and,
- d) linkages are made to existing North Warwickshire settlements to ensure connectivity between places especially via walking and cycling

Category 3: Local Service Centres – Baddesley with Grendon, Hartshill with Ansley Common, New & Old Arley, Kingsbury, Water Orton

Category 4: Other Settlements with a development boundary - Ansley, Austrey, Curdworth, Fillongley, Hurley, Newton Regis, Piccadilly, Ridge Lane, Shuttington, Shustoke, Warton, Whitacre Heath, Wood End

Development within development boundaries will be supported in principle. Development directly adjacent to settlement boundaries may also be acceptable. All development will be considered on its merits; having regard to other policies in this plan and will cater for windfall housing developments usually on sites of no more than 10 units at any one time depending on viability, services and infrastructure deliverability

Category 5: *All other locations*

All Development

In all other locations development will not generally be acceptable, albeit as set out above that there may be some instances where development may be appropriately located and would enhance or maintain the vitality of rural communities under this category. Special circumstances should exist to justify new isolated homes in the countryside such as rural workers' needs, the optimal viable use of a heritage asset, the re-use of redundant buildings enhancing its immediate setting, the subdivision of an existing residential dwelling, or development of exceptional quality or innovative design or for rural exception sites in line with national planning policy. All such development will be considered on its merits and with regard to other policies in this plan.

LP5

LP5 Amount of Development

Between 2011 and 2033 the Council will make provision for a minimum of:

- 9598 new dwellings,
- 100 hectares of employment land (subject to policy LP6), and
- 19 permanent residential gypsy and traveller pitches between 2019 and 2033.

The actual amount of development delivered over the Plan period will be governed by the provision of infrastructure to ensure developments are sustainable.

DRAFT

LP6

- 7.46 Area A encompasses land covered by the Strategic Gap, designated Green Belt, and land which is not in categories 1, 2, 3 or 4 of plan policy LP2. This policy does not automatically override other policies but recognises that there are particular locational requirements specific to certain employment uses and economic benefits to addressing needs in those locations. As such, any weight accorded to proposed employment provision by virtue of this policy will be considered in the context of the policies in the plan as a whole in arriving at a balanced assessment.

LP6 Additional Employment Land

Significant weight will be given in decision taking to supporting economic growth and productivity, particularly where evidence demonstrates an immediate need for employment land, or a certain type of employment land, within Area A on Figure 4.10 of the West Midlands Strategic Employment Sites Study of September 2015 (or successor study) which cannot be met via forecast supply or allocations. The relevant scheme will be required to demonstrate:

- (i) access to the strategic highway network is achievable and appropriate,
- (ii) the site is reasonably accessible by a choice of modes of transport,
- (iii) it is otherwise acceptable, taking account of the living conditions of those nearby.

Employment Requirements

- 7.36 With the abolition of the Regional Spatial Strategy the Borough Council has to consider its employment land target. Looking at the available evidence it has been decided to continue with the target to equate to 11 hectares over a 5 year period. Therefore, over the Plan period this equates to a total of 60 hectares.
- 7.37 The 2013 Employment Land Review (ELR) identified a need for 60 hectares for employment needs and this was reflected in the 2014 Core Strategy. At that time it was understood that 2 hectares of land at Spring Hill Industrial Estate, Arley, would be lost from employment use. The site has however remained in employment use and is now fully used. The continued use of the land for employment purposes reduced the need to find those 2 additional hectares elsewhere.
- 7.38 Consultants have revisited the Employment Land Review providing the evidence to show that there is still a need for 58 hectares (excluding 2 hectares at Spring Hill) of employment land within the Borough. The indications are that this requirement will be sufficient to deal with the minimum growth of 5280 dwellings. Further employment land will be required if further housing growth is possible. If the full 9600 dwellings is delivered around 100 hectares of land will be required between 2011 and 2033.
- 7.39 Unlike during the preparation of the Core Strategy the Borough Council has now been approached to deliver employment land for a neighbouring local authority. Tamworth Borough Council is seeking the Borough to deliver a proportion of 14 hectares in partnership with Lichfield District Council. A site allocation has been identified to satisfy a part of these 14 hectares. Lichfield DC has confirmed that they are looking to provide for the balance of 6.5 hectares in their emerging Local Plan. As any additional housing and employment needs to be considered in balance and Tamworth lies within the Greater Birmingham HMA any proportion delivered will be within the overall employment land requirements and are not additional. This will avoid double counting.
- 7.40 Within the Coventry & Warwickshire HMA consideration has been given to the employment land requirements across the HMA. As a result a Memorandum of Understanding has been agreed on the delivery of additional employment land to address a shortfall in provision from Coventry City Council. There are no additional land requirements that the Borough must consider.
- 7.41 In addition, since the preparation of the Core Strategy two studies⁵ have made it clear that there is a wider than local need for large sites. This provision does not necessarily have to be provided for within North Warwickshire. The Borough Council will continue to work with other local planning authorities to see what opportunities there are around the East and West Midlands to deal with this need. There are large scale sites coming forward in other areas such as Daventry, Market Harborough, North-West Leicestershire and South Staffordshire. It is considered more important for the Borough to focus its attention on widening the employment base and to build on the opportunities that the Horiba MIRA Technology Park can provide and seek the provision of aspirational job opportunities within the Borough.

LP11

Chapter 9 Employment

- 9.1 Economic growth is a key Government goal and Local Enterprise Partnerships have been developed to pursue this. The Borough Council wants to work with the private sector to create long lasting local employment opportunities as well as mitigate any adverse impacts and enhance the rural character of the Borough.
- 9.2 Historically North Warwickshire had a number of large brownfield sites that have been redeveloped. Two of the largest sites are Hams Hall and Birch Coppice, which were seen as regional logistic sites in the abolished Regional Spatial Strategy and benefits from intermodal rail freight facilities. Many of the main settlements have a range of industrial estates.
- 9.3 Although North Warwickshire has seen one of the largest growths in terms of logistics and support facilities in the West Midlands it is still a fragile economy, with a high dependency on a narrow range of sectors and larger employers. The growth of the small to medium sized enterprises, in particular, will continue to be supported. Both appropriate rural diversification and regeneration of existing sites will be part of the long term strategy to address the economic issues that the Borough faces.
- 9.4 There is the Horiba MIRA Technology Park, an Enterprise Zone, south of the A5 primarily aimed at research and development. Plans for the development of UK Central around the HS2 Interchange Station on the south west border of the Borough are also expected to provide higher skilled jobs opportunities. With the development of the latter two sites, this will change the local market and will provide opportunities to diversify the local economy for different types of employment growth. The Borough Council is keen to exploit these opportunities.
- 9.5 In addition, to target the priority issues and needs identified through the Sustainable Community Strategy, it is considered that all employment related development, should support and assist improvements to access to services, health, skills training and education opportunities through appropriate contributions or specific service delivery. The aim is to address the skills and education deficit and improve aspiration, opportunity and choice of employment. Delivery will need to provide a more focused match between available local employment and the existing and aspirational local employee skill base, in order to meet local economic needs and to address the large scale out-commuting pattern that presently exists in the Borough.
- 9.6 The Borough Council will work with neighbouring authorities and relevant Local Enterprise Partnerships to develop and assist companies. In particular research and development and other knowledge-based companies/facilities would be welcomed in order to broaden the range of higher skilled employment generating uses.
- 9.7 The provision of highspeed broadband throughout the Borough will be important to allow businesses to grow, develop and exploit the opportunities coming forward as a result of the MIRA Technology Park.
- 9.8 Delivery of appropriate employment uses and redevelopment within existing employment sites should reflect the need to broaden the employment base and improve employment choice and opportunity. This will assist both in the employment choice and opportunities across the Borough. It is important therefore to protect employment land from alternative uses. However,

the Borough Council recognises that this cannot always be the case. Proposals for a change of use from employment uses to non-employment uses should be supported by evidence to show that the existing buildings and land are not suitable or cannot be viably reused for another employment use. Evidence should include details of the marketing of the site for employment use for at least 12 months.

LP11 Economic Regeneration

The delivery of employment generating uses, including the redevelopment of existing employment sites and farm diversification, should reflect the need to broaden the employment base, improve employment choice and opportunities for local people.

All employment land will be protected unless it can be demonstrated that there is no realistic prospect of the site being used for employment purposes. Evidence would need to demonstrate that:

- The site is no longer commercially viable; and,
- It has been marketed for an appropriate period of time, usually no less than 12 months.

Support and encouragement will be given to established / lawful rural businesses to expand where this has no significant and demonstrable harm in particular on the character of the area.

Proposals for new development and redevelopment of existing employment land outside of development boundaries will be considered against Policy LP1 and LP2 and should seek to retain the rural character, appearance and openness of the countryside (including in respect of policy LP3, Green Belt).

LP12

Employment Areas

- 9.9 There are a number of industrial areas throughout the Borough. Some are purpose built whilst others like Manor Road have grown out of the location of other historical uses. It will be expected that the majority of employment generating uses will be concentrated into these areas.

LP12 Employment Areas

The following existing industrial estates together with the sites allocated in this Plan support the functioning of the Borough and in particular the Market Towns and Local Service Centres:

- Holly Lane, Atherstone
- Carlyon Road, Ratcliffe Road and the Netherwood Estate, Atherstone
- Manor Road, Mancetter
- Coleshill Industrial Estate
- Kingsbury Link
- Collier's Way, Arley
- Kingsbury Road, Curdworth
- Hams Hall, Coleshill
- Birch Coppice, Dordon including Core 42

Within all of these estates as illustrated on the Policies Map, changes of use between the Class E, B2 general industrial and B8 warehouse and distribution Use Classes will be permitted provided there are no negative effects arising that cannot be suitably mitigated. However at Collier's Way, New Arley and at Manor Road, Mancetter B8 uses will not be permitted.

The rail freight terminals at Birch Coppice and Hams Hall are of strategic significance. Development proposals on these two estates will be encouraged to use these terminals. Existing rail sidings on other sites will be safeguarded.

LP13

Rural Employment

- 9.10 The Local Plan seeks to support and encourage small scale rural businesses to develop and to enable their expansion where this does not impact detrimentally on the countryside character in environmental or sustainable terms.

LP13 Rural Employment

Farm Diversification

Proposals for farm diversification through the introduction of new uses onto established farm holdings will be supported where it can be demonstrated that:

- a) the development in terms of its scale, nature, location and layout would contribute towards sustaining the long-term operation and viability of the farm holding;
- b) it would not cause an unacceptable adverse impact to the safe and free movement of pedestrian, vehicular or other traffic on the trunk or rural road network as a result of heavy vehicle usage,
- c) there would be no adverse impacts arising from increased noise or other form of pollution,
- d) there are adequate foul drainage facilities, and
- e) there would be no adverse impact on the character of the surrounding natural or historic environment.

Re-Use of Existing Rural Buildings

Proposals for the re-use and adaptation of existing rural buildings will be supported provided that the following three pre-conditions are all satisfied:

- a) The buildings are readily accessible to the Main Towns and Local Service Centres via a range of modes of transport;
- b) they are of sound and permanent construction, and
- c) are capable of adaptation or re-use without recourse to major or complete re- building, alteration or extension.

If the building is a Listed Building or one that is recognised as a locally important building, then irrespective of the foregoing pre-conditions, the re-use or adaptation of that building will be considered if the proposal is the only reasonable means of securing its retention. The proposal will be considered alongside LP15. Development proposals will have to show an understanding of the historic and/or architectural significance of that building; its relationship to its setting and its sensitivity to change. Appropriate materials should be used along with methods of repair which respect the building's significance. As much of the fabric of the building, as possible, that embodies its character and interest should be retained. The criteria set out in section (a) of this policy will however still apply in these cases.

Provided that the building meets these pre-conditions, the preferred re-use of the building for a rural business or service or one that supports an established rural business. Only where demonstrable adverse impacts would arise or such a use can be evidenced to be unviable, would an alternative use be considered. Tourism uses and locally affordable housing provision may be appropriate in this situation in accordance with Policies LP2, LP3 and LP9.

Extract from AMR 2022/23

LP6 Additional employment land

Indicator/ metrics
Amount of employment land provision delivered by Use Class and by hectare and square metre relative to evidence of immediate unmet need within Area A as defined in the West Midlands Strategic Employment Sites Study (September 2015) or subsequent iteration or similar strategic study.
Target:
Report trend

LP11

Indicator/ metrics
<i>Employment generation and diversification (links with LP12 and LP13)</i>
Target
<i>i. Increased and broadened/ diversified employment provision relative to the objectives in LP11</i>
<i>ii. Existing provision safeguarded unless loss is justified.</i>

Over the last three years (including the pandemic period) there have been a number of significant employment generating applications that have also contributed to the diversification of the Borough's employment base.

There are two significant strategic/regional related leisure facilities that have been approved including the "Wall of prayer" visitor attraction, east of Coleshill and the Surf Centre (training/education and visitor leisure facility)

Both of which, when completed, are likely to generate and broaden local employment, with the Surf Centre facility estimated to create 100 full-time equivalent jobs and attract 250,000 visitors.

The online planning application reference are respectively as follows:-

Prayer Wall Landmark Art Structure and visitor centre – PAP/2019/0701 ,
Surf Centre Birmingham - PAP/209/0496,

LP12 Employment Areas

Indicator/ metric
Target
Existing employment base maintained (links with LP11 and LP13) Report trend
Employment land change by Use Class and by hectare and square metre

Further work is required to extract the information from the planning to monitor this indicator.

LP13 Rural Employment

Indicator/ metrics
<i>Farm and rural business growth and diversification, including number of proposals for re-use of existing buildings (links with LP11 and LP12)</i>
Target
<i>Report trends</i>

The potential for redevelopment of farm buildings and diversification of farm businesses has been encouraged by recent changes to National planning policy and regulations for Prior Approvals under permitted development rights, where existing agricultural buildings can be changed to up to 5 dwellinghouses.

Within the last three monitoring years the following planning consents for agricultural building conversions and/or 'prior approval' redevelopments' to residential have been granted.

Residential:

19/20 – 48 applications approved; 8 sites completed

20/21 – 8 applications approved; 2 sites completed

21/22 – 12 applications approved; 0 sites completed

In terms of similar applications or prior approvals for change of use and conversion or redevelopment to employment of other non-agricultural commercial uses the following numbers have been granted.

Employment:

19/20 NIL

20/21 1 application

21/22 NIL

As can be seen from the figures above, there is a clear pressure and financial preference to accommodating building conversions, C/U and/or Prior Approval redevelopments for residential and not employment uses. This is understandable given the current housing pressures and needs and in the differing land/property values the two differing types of development will achieve.

There are concerns that the impact of loss of agriculture infrastructure and operations along with limited employment diversification and commercial opportunities for farming businesses could be detrimental. The introduction of residential uses into working agricultural businesses can cause amenity conflicts (noise, fumes/dust etc) between the uses as well as putting pressures of provision of services and infrastructure in rural areas. This is an area and issue that may benefit from further monitoring and assessment, particularly if the benefit of diversification in farming through redevelopment is not leading to uses that either benefit agricultural businesses or results in diversifying and improving rural employment opportunities.

LP34 Parking

Indicator/ metrics	
Adequate vehicle parking provision made relative to accessibility of location, including in respect of lorry parking	
Targets	
i.	Report trends
ii.	No net loss of lorry parking provision without justification.

i. Report trends

Policy LP34 seeks “Electric charging points will be provided as part of all relevant developments ... Rapid charging points will be provided on sites when located in the public realm”. New housing developments will be expected to provide “E” charging facilities as part of their parking provision and currently 52 relevant housing planning consents are conditioned to require Electric charging points and bays to be installed (Consents between 1/04/2019 and 31/03/2022). (Note, where planning proposals already include and provide for ‘e’-charging points as part of the development and design/infrastructure, it is un-necessary to always condition the consent, so more housing developments will have been approved with ‘e’-charging facilities than the 52 identified).

The number of public “E” vehicle charging points is gradually increasing in the Borough. There are currently 8 public charging points now available, 3 of which are located on major leisure facilities so

have limited access and availability, the remaining located on-street or in public car parks, associated with grant funding and partnership between Warwickshire County Council and BP Pulse.

ii. No net loss of lorry parking provision without justification.

It is difficult to ensure that monitoring can pick up all applications where loss of lorry parking can be picked up due to permitted development rights and the ability to change the make-up of sites where there is no direct engineering or building works. Therefore it is proposed to monitor applications for lorry parking. Since 2019 there has been an extension of lorry parking at Corley Services. There are currently two pending planning applications submitted (*Please note that since the AMR was published that one planning has been determined and one is pending*) which include lorry parking with decisions expected in 2023. These are:

1 Land West of Hams Hall Roundabout and south of Marsh Lane, Curdworth

Outline application (PAP/2020/0295) for an overnight truck stop comprising 200 HGV spaces and associated facilities including fuel refuelling station, amenities building, electric vehicle charging points

2 Land on the Northeast of J10 M42 Dordon/A5

Outline planning application (PAP/2021/0663) for development of land within Use Class B2 (general industry), Use Class B8 (storage and distribution) and Use Class E(g)(iii) (light industrial), and ancillary infrastructure and associated works, development of overnight lorry parking facility and ancillary infrastructure and associated works. Details of access submitted for approval in full, all other matters reserved.

*Employment Development Plan Document
Draft for Consultation
January 2024*

Appendix C

LP5

Employment Land Supply from 1st April 2019 to 31 March 2022

2019/20

Completions of sites over 0.4 hectares

None

Outstanding on sites over 0.4

Site		Planning application number	Status	Size	Use class
Coleshill Hall Hospital	Coleshill	PCOLXX/1274/99/FAP	UC	16.38	B1/2/8
Dosthill	Dosthill	PAP/2013/0298	UC	6.76	B1/B2/B8
Core 42	Dordon	PAP/2017/0014	UC	17.42	B1, B2 & B8
Land north east of the Beanstalk - Plot 7	Dordon	PAP/2015/0679	UC	2.2	B1, B2, B8
SE of Junction 10 M42 (won at appeal)	Dordon	PAP/2018/0149	UC	25.37	B1/2/8
Kingsbury Road	Curdworth	PAP/2017/0521	NS	0.99	A1, Other
Power Station B Site	Hams Hall	PAP/2018/0036	UC	20	B1, B2, B8
Plot 13 Marconi Way	Hams Hall	PAP/2018/0763	NS	1.069	Office
Land south of Rowland Way	Atherstone	PAP/2018/0159	NS	1.92	B1(a), B8
				92.109	

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Completions of sites under 0.4 hectares

Unit 11	Atherstone	PAP/2018/0139	COM	0.39	B1(a), B2
				0.39	

Outstanding of sites under 0.4

Site		Planning application number	Status	Size	Use class
BEC Engineering Ltd	Atherstone	PAP/2014/0432	NS	0.11	loss of factory
Lane's Yard	Lea Marston	PAP/2017/0234	NS	0.02	B2
3 Springhill	Arley	PAP/2017/0179	NS	0.01	B8
Plot W1A	Dordon	PAP/2018/0284	NS	0.1	B1(a)
Park Gate Farm	Middleton	PAP/2018/0696	NS	0.29	Other
Land rear of unit 12B	Atherstone	PAP/2018/0475	NS	0.15	B1(c)
Langley Brook business park	Middleton	PAP/2018/0711	NS	0.30	B8
Magna House	Atherstone	PAP/2019/0403	NS	0.04	loss of office
The Boot	Grendon	PAP/2019/0151	NS	0.07	A4, A1, B1(a), D2
The Black Swan	Grendon	PAP/2017/0219	NS	0.01	A3
				1.1	

Loss of Employment Land

Unit 6	Atherstone	PAP/2017/0673	NS	0.04	loss B1/B2/B8
				0.04	

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2020/21

Completions of above 0.4 hectares

Site		Planning application number	Status	Size	Use class
Land north east of the Beanstalk - Plot 7	Dordon	PAP/2015/0679	COM	2.2	B1, B2, B8
Kingsbury Road	Dordon	PAP/2017/0521	COM	0.99	A1, Other
Power Station B Site	Hams Hall	PAP/2018/0036	COM	20	B1, B2, B8
Plot 13 Marconi Way	Hams Hall	PAP/2018/0763	COM	1.069	Office
				24.259	

Outstanding applications of over 0.4 hectares

Site		Planning application number	Status	Size	Use class
Coleshill Hall Hospital	Coleshill	PCOLXX/1274/99/FAP	UC	16.38	B2
Dosthill	Dosthill	PAP/2013/0298	UC	6.76	B1, B2 & B8
Core 42	Dordon	PAP/2017/0014	UC	17.42	B1(c), B2, B8
SE of Junction 10 M42 (won at appeal)	Dordon	PAP/2018/0149	UC	25.37	B1/2/8
Land south of Rowland Way	Atherstone	PAP/2018/0159	NS	1.92	B1(a), B8
				67.85	

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Completions of under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Plot W1A	Dordon	PAP/2018/0284	COM	0.1	B1(a)
Park Gate Farm	Middleton	PAP/2018/0696	COM	0.29	Other
The Boot	Grendon	PAP/2019/0151	COM	0.07	A4, A1, B1(a), D2
The Black Swan	Grendon	PAP/2017/0219	COM	0.01	A3
				0.47	

Outstanding applications of under 0.4 hectares

Site		Planning application number	Status	Size	Use class
3 Springhill	Arley	PAP/2017/0179	NS	0.01	B8
Land rear of unit 12B	Atherstone	PAP/2018/0475	NS	0.15	B1(c)
Langley Brook business park	Middleton	PAP/2018/0711	NS	0.30	B8
Lanes Yard, Kingsbury Road, Lea Marston	Lea Marston	PAP/2020/0109	NS	0.30	B2
Crida House	Curdworth	PAP/2020/0269	NS	0.24	B1(c)
Town Council Offices	Atherstone	PAP/2020/0056	NS	0.01	B1(a)
				1.23	

Loss of Employment land

BEC Engineering Ltd	Atherstone	PAP/2014/0432	NS	0.11	loss of factory
Unit 6	Atherstone	PAP/2017/0673	NS	0.04	loss B1/B2/B8
Magna House	Atherstone	PAP/2019/0403	UC	0.04	loss of office
Britannia Works	Atherstone	PAP/2020/0568	NS	0.03	loss of B2

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				0.22	
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2021/22

Completions over 0.4 hectares

Site		Planning application number	Status	Size	Use class
Core 42	Dordon	PAP/2017/0014	COM	17.42	B1, B2 & B8
SE of Junction 10 M42 (won at appeal)	Dordon	PAP/2018/0149	COM	25.37	B1/2/8
				42.79	

Outstanding over 0.4 hectares

Site		Planning application number	Status	Size	Use class
Coleshill Hall Hospital	Coleshill	PCOLXX/1274/99/FAP	UC	16.38	B1/2/8
Dosthill	Dosthill	PAP/2013/0298	UC	6.76	B1/B2/B8
Land south of Rowland Way	Atherstone	PAP/2018/0159	NS	1.92	B1(a), B8
				25.06	

Completions under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Land south-west of M42 roundabout Dordon	Dordon	PAP/2021/0108	COM	0.23	B8
112 High Street	Coleshill	PAP/2021/0139	COM	0.02	loss of office
				0.25	

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Outstanding under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Magna House	Atherstone	PAP/2019/0403	UC	0.04	loss of office
Lanes Yard, Kingsbury Road, Lea Marston	Lea Marston	PAP/2020/0109	NS	0.30	B2
Crida House	Curdworth	PAP/2020/0269	NS	0.24	B1(c)
Town Council Offices	Atherstone	PAP/2020/0056	NS	0.01	B1(a)
Britannia Works	Atherstone	PAP/2020/0568	NS	0.03	loss of B2
Kingsbury Link	Kingsbury	PAP/2021/0220	NS	0.01	B1(c)
70-72 High Street	Coleshill	PAP/2021/0289	NS	0.07	loss of office
104, High Street	Coleshill	PAP/2020/0031	NS	0.08	loss of office
133a, Long Street	Atherstone	PAP/2020/0144	NS	0.00	loss of office
Westbourne Leisure, 45 Parkfield Road	Coleshill	PAP/2020/0494	UC	0.03	loss of office
				0.81	

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January 2024*

2022/23

TO BE COMPLETED
Completions over 0.4 hectares

Site		Planning application number	Status	Size	Use class

Outstanding over 0.4 hectares

Site		Planning application number	Status	Size	Use class
Coleshill Hall Hospital	Coleshill	PCOLXX/1274/99/FAP	UC	16.38	B1/2/8
Dosthill	Dosthill	PAP/2013/0298	UC	6.76	B1/B2/B8
Land south of Rowland Way	Atherstone	PAP/2018/0159	NS	1.92	B1(a), B8
				25.06	

Completions under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Land south-west of M42 roundabout Dordon	Dordon	PAP/2021/0108	COM	0.23	B8
112 High Street	Coleshill	PAP/2021/0139	COM	0.02	loss of office
				0.25	

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Outstanding under 0.4 hectares

Site		Planning application number	Status	Size	Use class
Magna House	Atherstone	PAP/2019/0403	UC	0.04	loss of office
Lanes Yard, Kingsbury Road, Lea Marston	Lea Marston	PAP/2020/0109	NS	0.30	B2
Crida House	Curdworth	PAP/2020/0269	NS	0.24	B1(c)
Town Council Offices	Atherstone	PAP/2020/0056	NS	0.01	B1(a)
Britannia Works	Atherstone	PAP/2020/0568	NS	0.03	loss of B2
Kingsbury Link	Kingsbury	PAP/2021/0220	NS	0.01	B1(c)
70-72 High Street	Coleshill	PAP/2021/0289	NS	0.07	loss of office
104, High Street	Coleshill	PAP/2020/0031	NS	0.08	loss of office
133a, Long Street	Atherstone	PAP/2020/0144	NS	0.00	loss of office
Westbourne Leisure, 45 Parkfield Road	Coleshill	PAP/2020/0494	UC	0.03	loss of office
				0.81	

Allocations in adopted Local Plan

SITE	USE CLASS	Gross Area – Ha's	Current position as at 31st March 2023
E1 - Holly Lane, Atherstone	B1/B2/B8	6.6	
E2 - West of Birch Coppice	B1/B2/B8	5.1	
E3 - Playing fields south of A5	B1	3.5	
E4 - MIRA	Eg(ii)/B2	42	Planning application has been submitted on a larger site – 60 hectares
TOTAL		57.2	

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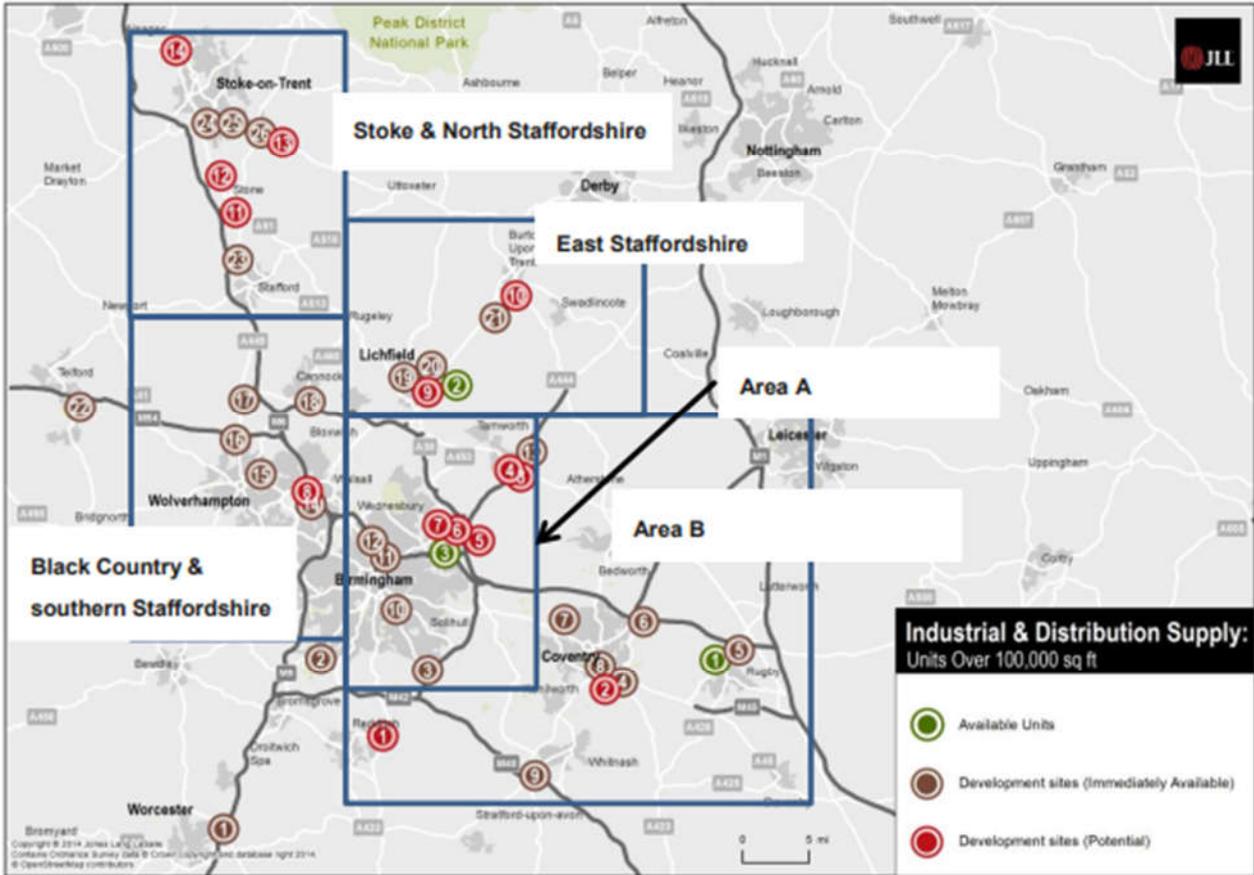
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Total Land Supply as at 31st March 2023

	over 0.4 hectares	under 0.4 hectares	Total
<i>Total Completions Since 2019/20 – 2021/2022</i>			
<i>2019/20</i>	0	0.39	
<i>2020/21</i>	24.25	0.47	
<i>2021/22</i>	42.79	0.25	
<i>2022/23</i>			
<i>Allocations In Local Plan</i>	57.2	0	
<i>Outstanding Sites with Planning Permissions as at 2021/22</i>	25.06	0.81	
Total	149.3	1.92	151.22
<i>Loss of employment land</i>	0	0.26	0.26
Total minus losses			

Extracts from the 2015 West Midlands Strategic Employment Sites Study

Figure 4.11 Immediate and potential industrial land supply, West Midlands, end 2014



Source: JLL

Employment Development Plan Document
Draft for Consultation
January 2024

Table 4.7 Potential industrial land supply, West Midlands, end 2014, 20+ acres

Map No	Site	Size, acres	Developer	Comments
1	Redditch Gateway, Redditch	47	Gorcott Estate, HCA and Stoford	Allocated in draft Stratford core strategy. Awaiting planning consent. Infrastructure required. Site straddles Coventry & Warks and Worcestershire.
2	Coventry Gateway, Coventry	168	Rigby Holdings Ltd	Permission refused at appeal by Secretary of State. Councils intend to re-submit following Green Belt review and adoption of Local Plans
3	Birch Coppice Phase 3, Dordon	70	IM Properties, Hodgetts Estates	Likely to be developed separately based on different ownerships Site has planning consent
4	Land at Junction 10, M42, Phase 2	60	St Modwen	Application for 80,000 sq m submitted in December 2014
5	Land at Hams Hall, Coleshill	50	E.ON	Green Belt
6	Birmingham International Gateway (BIG), Birmingham	227	Prologis, Ashford Development	Green Belt site on boundary of Birmingham and North Warwickshire, being promoted as extension to Peddimore allocation in Birmingham Development Plan
7	Peddimore	175	ProLogis	Allocated in Birmingham Development Plan
8	Phoenix 10, Darlaston	37	HCA	IMI site. Serious issues with ground conditions and access
9	Lichfield Park, Lichfield	24	Stoford Developments	CPO was secured 2014, access bridge close to completion and construction of industrial units will follow
10	Branston Locks, Burton Upon Trent	50	Nurton Developments	Planning permission to be granted in the near future
11	Extension to Stone Business Park, Staffs	33	Stoford Developments	Allocated by the Stafford Local Plan
12	Meaford Power Station, Stone	69	St Modwen	Site has planning permission. Access improvements needed, funding application was unsuccessful
13	Blythe Vale Business Park, Stoke	115	St Modwen	Planning limited to B1. Not being actively marketed.
14	Chatterley Valley, Stoke	112	Harworth Estates	Ground remediation and levelling issues
Total		1,237		

Source: JLL

Evidence

NPPF	2021
North Warwickshire Local Plan (NWLP)	adopted 2021
NP's	
Coventry & Warwickshire HEDNA	2022

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Strategy for Lorry Parking in England (DfT, 2009)

Further to the Lorry Parking Baseline Report, the DfT published its Strategy for Lorry Parking Provision in November 2009.

This sets out strategic objectives for lorry parking provision:

- Build on the current understanding of lorry parking provision and investigate the demand requirements up to 2014 – 2019 and beyond if necessary;
- Define the position of lorry parking policy at national, regional and local levels where required;
- Support Industry by providing Best Practice Guidance and further information to help stabilise business;
- Create an environment where lorry parking schemes can be brought forward by the private sector as more feasible investment opportunities. To help to make lorry parking businesses more sustainable and competitive;
- Increase awareness of existing lorry parking locations and encourage their appropriate usage. Increase the awareness of areas in need of lorry parking;
- Encourage the development and use of secure lorry parking locations with an added intention of improving working conditions for drivers.

The Strategy also sets out an action plan, focussing on:

- A lorry parking model;
- Policy/planning engagement to facilitate protection/development of lorry parking provision;
- Best practice guidance;
- Financial considerations;
- Consideration of using other sites (such as Park and Rides);
- Reducing inappropriate lorry parking, for example through the use of Traffic Regulation Orders and pay meters;
- Promotion of lorry parking facilities, for example through the Truckstop Guide;
- Use of technology (such as satellite navigation) in identifying lorry parking locations and supporting information such as weight and height restrictions. This could provide benefits for drivers that require an alternative location to park for the night;
- Stakeholder communication; and
- Engaging with European lorry parking projects (e.g. SETPOS).

Background information on Lorry Parking evidence from previous studies and surveys.

Previous studies and surveys.

Approximately 15 years ago the Government produced a number of studies looking in more detail at the issues concerning the movement of freight within Great Britain, across modes, including the nature and composition of freight flows on the major corridors. These include Department for Transport: Delivering A Sustainable Transport System: The Logistics Perspective (December 2008) and Nov 2009 - Lorry Parking Baseline Report, Understanding the Current Situation. These studies identified a number of issues including;

- Freight continues to contribute to congestion on our road networks;
- rail capacity issues arise from increases in freight services;
- noise (particularly for out of hours freight deliveries);

- the overall fuel efficiency of HGVs; and
- highway safety issues and skills shortages, much of which remains/continues today.

As part of the need for investment into the industry in network infrastructure and technology, the need for an action plan or strategy on lorry parking was highlighted, leading up to further work as follows;

The DoT produced a Strategy and Action Plan for Lorry Parking Provision in England (Nov 2009) covering the period 2014 to 2019 and beyond, establishing a series of Objectives and Actions aimed at providing guidance, encouraging provision and improving planning outcomes for lorry parking facilities and services. (See Appx XXXX). Unfortunately many of the objectives and Action Plan aims have not been followed up or supported through investment with the lack of provision continuing to date. A Lorry Parking study was subsequently undertaken by AECOM Consultants for the DoT in 2011. This led up to a national lorry Parking Survey in 2017.

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